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8	Attorneys for Complainant		
9	BEFORE THE		
10	BOARD OF REGISTERED NURSING DEPARTMENT OF CONSUMER AFFAIRS		
11	STATE OF CAL	JIFORNIA	
12	In the Matter of the Accusation Against:	Case No. 2007 - 269	
13	SUSIE ARGUELLO,		
14	a.k.a. SUSIE M. ARGUELLO 4118 Chris Drive	ACCUSATION	
15	Abilene, TX 79606		
16	Registered Nurse License No. 597236		
17	Respondent.		
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19	Complainant alleges:		
20	<u>PARTIES</u>		
21	1. Ruth Ann Terry, M.P.H., R.N. ("Complainant") brings this Accusation		
22	solely in her official capacity as the Executive Officer of the Board of Registered Nursing		
23	("Board"), Department of Consumer Affairs.		
24	2. On or about April 2, 2002, the Board issued Registered Nurse License		
25	Number 5972,36 to Susie Arguello, also known as Susie M. Arguello ("Respondent").		
26	Respondent's registered nurse license was in full force and effect at all times relevant to the		
27	charges brought herein and will expire on July 31, 2007, unless renewed.		
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STATUTORY PROVISIONS

- 3. Business and Professions Code ("Code") section 2750 provides, in pertinent part, that the Board may discipline any licensee, including a licensee holding a temporary or an inactive license, for any reason provided in Article 3 (commencing with section 2750) of the Nursing Practice Act.
- 4. Code section 2764 provides, in pertinent part, that the expiration of a license shall not deprive the Board of jurisdiction to proceed with a disciplinary proceeding against the licensee or to render a decision imposing discipline on the license. Under Code section 2811, subdivision (b), the Board may renew an expired license at any time within eight years after the expiration.
 - 5. Code section 2761 states, in pertinent part:

The board may take disciplinary action against a certified or licensed nurse or deny an application for a certificate or license for any of the following:

(a) Unprofessional conduct, which includes, but is not limited to, the following:

. . . .

(4) Denial of licensure, revocation, suspension, restriction, or any other disciplinary action against a health care professional license or certificate by another state or territory of the United States, by any other government agency, or by another California health care professional licensing board. A certified copy of the decision or judgment shall be conclusive evidence of that action . . .

COST RECOVERY

6. Code section 125.3 provides, in pertinent part, that the Board may request the administrative law judge to direct a licentiate found to have committed a violation or violations of the licensing act to pay a sum not to exceed the reasonable costs of the investigation and enforcement of the case.

CAUSE FOR DISCIPLINE

(Disciplinary Action by the Texas Board of Nurse Examiners)

7. Respondent is subject to disciplinary action pursuant to Code section 2761, subdivision (a)(4), on the grounds of unprofessional conduct. On or about April 7, 2004, pursuant to the Agreed Order entered into between Respondent and the Texas Board of Nurse

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1	Examiners in the disciplinary proceeding titled In the Matter of License Number 668745 issued		
2	to SUSIE ARGUELLO, Respondent voluntarily surrendered her license to practice registered		
3	nursing in the state of Texas ¹ . A true and correct copy of the Agreed Order is attached as exhibit		
4	"A" and incorporated herein by reference.		
5	<u>PRAYER</u>		
6	WHEREFORE, Complainant requests that a hearing be held on the matters herein		
7	alleged, and that following the hearing, the Board of Registered Nursing issue a decision:		
8	1. Revoking or suspending Registered Nurse License Number 597236, issued		
9	to Susie Arguello, also known as Susie M. Arguello;		
10	2. Ordering Susie Arguello, also known as Susie M. Arguello, to pay the		
11	Board of Registered Nursing the reasonable costs of the investigation and enforcement of this		
12	case, pursuant to Business and Professions Code section 125.3; and		
13	3. Taking such other and further action as deemed necessary and proper.		
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15	DATED: 4/10/07		
16			
17			
18	RUTH ANN TERRY, M.P.H., R.N. Executive Officer Board of Registered Nursing Department of Consumer Affairs		
19			
20	State of California Complainant		
21	Complainant		
22			
23			
24	03579110-SA2006102310		
25	Arguello, Susie.acc.wpd clp; 3/16/07		
26			
27	1. The Agreed Order also provided that Respondent would be allowed to petition for reinstatement of		

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^{1.} The Agreed Order also provided that Respondent would be allowed to petition for reinstatement of licensure after one year had elapsed from the date of the Order and she had obtained objective, verifiable proof of twelve (12) consecutive months of sobriety immediately proceeding the petition.